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February 14, 2018

BY ECF

Honorable Stuart M. Bernstein
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, NY 10004

Re: *Securities Investor Protection Corporation v. Bernard L. Madoff Investment Securities LLC*, No. 08-1789 (SMB); *Securities Investor Protection Corporation v. Citibank, N.A., et al.*, No. 10-5345 (SMB)

Dear Judge Bernstein:

I represent defendants Citibank, N.A. and Citicorp North America, Inc.¹ (the “Citi Transferee Defendants”) in the above referenced matter. As requested by the Court during oral argument on February 8, 2018, I write to provide the Court with a chart comparing the Trustee’s proposed document requests attached as Exhibit D to the August 28, 2014 Declaration of Regina Griffin, No. 10-5345, ECF No. 73 (the “Trustee’s Proposed Document Requests”), with the requests in the Rule 2004 subpoena the Trustee served on Citigroup Global Markets Holdings, Inc., an affiliate of the Citi Transferee Defendants, on July 29, 2009 (the “Citi Rule 2004 Subpoena”).² The chart is attached as Exhibit A and includes a column categorizing the Trustee’s Proposed

¹ The Trustee’s Complaint names as a defendant “Citibank North America, Inc.,” an entity that does not exist.

² The Citi Rule 2004 Subpoena is attached as Exhibit 1 to the Declaration of Carmine D. Boccuzzi, Jr. in Opposition to the Trustee’s Motion for Discovery on the Good Faith Issue, No. 10-5345, ECF No. 123.

Hon. Stuart M. Bernstein , p. 2

Document Requests as well as additional columns demonstrating how the requested information in each category tracks the related requests in the Citi Rule 2004 Subpoena.

Respectfully,

/s/ Carmine D. Boccuzzi, Jr.
Carmine D. Boccuzzi, Jr.

Attachment

cc: Counsel of Record